



STANISLAUS COUNTY INVESTMENT PLAN

HOUSING AND HOMELESSNESS INCENTIVE PROGRAM

September 30, 2022



MCP INFORMATION

Provide the name and contact information for the MCP submitting this IP response.

MCP Name	Health Net Community Solutions, Inc.
Lead Contact Person Name and Title	Deanna Eaves, Director, Compliance Sally Chow, Senior Manager, Compliance
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PART I: INVESTMENTS

To determine local HHIP investment opportunities, Health Net and our Plan Partner collaborated with the CA-510 Stanislaus Community System of Care, which serves Stanislaus County. The costs listed below were determined based on conversations with the CoC and our Plan Partner and are apportioned to Stanislaus County based on Medi-Cal membership in the county.

Investment Activity	Gap or Need Addressed	Description (2 – 3 sentences for each activity)	Dollar Amount or Range	Recipient(s) or Recipient Type(s)	Timeline	HHIP Measure(s) Impacted	Domain Targeted
1. Supporting the Point in Time (PIT) Count	During MCP, CA-510, and community partner meetings on 9/12, 9/23, the CoC identified insufficient resources for the 2023 PIT Count. This need as reiterated in the Stanislaus Regional Homeless Strategic Plan and Stanislaus County PIT Executive Summary.	Funds will support staffing, volunteer recruitment, and incentives to ensure complete geographic coverage for the 2023 PIT Count.	\$2,400	CA-510, CoC lead agency, or Stanislaus County	10/2022 – 12/2023	1.1	Provider/ Partner Infrastructure
2. Supporting	Based on CA-510 CoC and	Funds will support the CoC	\$40,500	CA-510 CoC, CoC	10/2022 –	1.2, 1.6,	Provider/ Partner

the Coordinated Entry System (CES) Infrastructure	community partner meetings on 9/19 and 9/23, and the Stanislaus Regional Homeless Strategic Plan, the community needs infrastructure and staffing support to implement HHIP and other CalAIM activities (i.e., Community Support services).	and community stakeholders to enhance their infrastructure and capacity to support HHIP and CalAIM coordination and partner training activities.		lead agency, or Stanislaus County	12/2023	2.2	Infrastructure
3. Supporting local HMIS Infrastructure	Based on MCP, CA-510 CoC, and community partner meetings on 9/12, 9/13, 9/19 and 9/23, there is a lack of coordination across referral and information systems between	Funds will support HMIS enhancements, staff capacity to support HHIP IP, technology infrastructure to include data exchange/MCP reporting, HMIS user fees, and user training.	\$75,000	CA-510 CoC, CoC lead agency, or Stanislaus County	10/2022 – 12/2023	1.2, 1.6, 2.2	Provider/ Partner Infrastructure

	healthcare and homeless service entities. The coordination challenges related to data means that MCPs are limited in their information about members and their housing outcomes.						
4. Supporting Data Exchange Capabilities	Based on MCP, CA-510 CoC, and community partner meetings on 9/12, 9/13, 9/19 and 9/23, housing service providers need support implementing data sharing agreements in alignment with HHIP program measures.	Funds will support efforts by housing service providers to uptake and operationalize the California HHS Data Exchange Framework: Single Data Sharing Agreement.	\$15,000	HMIS lead agency and/or housing service organizations	10/2022 – 12/2023	1.4	Provider/ Partner Infrastructure

5.Supportin g Street Medicine Capacity Building	Based on 09/12 meeting with CA-510 CoC and 09/12/22 meeting with street medicine provider, the county has limited street medicine services, and that additional infrastructure (i.e., staffing, technology) support is needed to enhance unsheltered member connections in Stanislaus County.	Funds will support housing service providers with needed infrastructure development to support unsheltered individuals; this can serve as an access point for ECM and CS services.	\$174,30 0	Street medicine providers	10/2022 – 12/2023	2.1, 3.3, 3.4	Provider/ Partner Infrastructure
6. Supporting Housing Placements	Based on the Stanislaus Regional Homeless Strategic Plan, MCP and CA- 510 CoC meeting on 06/20 and 09/12 meetings, and community	Funds will help close a funding gap for Central Valley Home Project (Vine Street location) to that will make available 46 new permanent housing units in 2023 for Medi- Cal members	\$720,00 0	Stanislaus County Behavioral Health and Recovery Services and Stanislaus Regional Housing Authority	10/2022 – 12/2023	1.6, 3.4, 3.5, 3.6	Direct Member Interventions

	partner meetings with Stanislaus County BHRS and Housing Authority, there is a need for additional permanent housing to address health disparities and community needs.	with SMI diagnosis.					
7. Supporting Housing Placements	Based on the Stanislaus Regional Homeless Strategic Plan, MCP and CA-510 CoC meetings on 06/20 and 09/12, and Stanislaus community partner meetings, there is a need for additional permanent housing to address health disparities and community needs.	Funds will support the development of micro housing units (Bridge Covenant Church Micro Housing Village). This project will develop 8 units in total to provide housing stability and supportive services to 27-36 community members (9 families) who are low-income and at risk of or are currently experiencing homelessness.	\$450,000	Housing service organizations	10/2022 – 12/2023	1.6, 3.4, 3.5, 3.6	Direct Member Interventions

8. Supporting Housing Placements	Based on the Stanislaus Regional Homeless Strategic Plan, MCP and CA-510 CoC meetings on 06/20 and 09/12, and Stanislaus community partner meetings, there is a need for additional permanent housing to address health disparities and community needs.	Funds will support the development of 9-unit modular home village (Free Will Baptist Church) that will provide permanent supportive, affordable housing to homeless individuals and voucher holders. The development will serve 30-35 clients (9 families) who are low-income and at risk of or are currently experiencing homelessness.	\$450,000	Housing service organizations	10/2022 – 12/2023	1.6, 3.4, 3.5, 3.6	Direct Member Interventions
9. Supporting Housing Placements	Based on the Stanislaus Regional Homeless Strategic Plan, MCP and CA-510 CoC meetings on 06/20 and 09/12, and Stanislaus community partner	Funds will support the construction of an 8-unit single family home development (Kestrel Ridge) that will be used as permanent supportive housing for behavioral health clients.	\$75,000	Stanislaus Regional Housing Authority	10/2022 – 12/2023	1.6, 3.4, 3.5, 3.6	Direct Member Interventions

	meetings, there is a need for additional permanent housing to address health disparities and community needs.						
10. Developing a Health Net Social Determinants of Health (SDOH) Platform	Health Net needs to enhance its existing technical capabilities and processes to more optimally handle SDOH/HMIS workflow to be able to match our member information with HMIS client information and to receive timely alerts from their local HMIS when our member experiences a change in housing status.	Health Net is developing a Social Determinants of Health (SDoH) Platform to ensure there is a unified, holistic, and scalable technology approach for enabling race, ethnicity, and language (REaL), sexual orientation and gender identity, (SOGI) and housing and other SDOH data exchange and integration with various 3rd party vendors and community provider systems. This platform will	\$83,857	Health Net	10/2022 – 12/2023	1.2, 2.2, 2.3, 3.1, 3.3, 3.4	MCP Infrastructure

		include data exchange through sFTP/FHIR API with HMIS systems.					
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PART II: RISK ANALYSIS

Description of Anticipated Contingencies (500 - 1000 word limit)

I. What factors the MCP anticipates may arise that would make it challenging for the MCP to achieve its goals and the HHIP program goals:

Through the DHCS Housing and Homelessness Incentive Program (HHIP), Health Net is committed to collaborating with the Stanislaus Community System of Care and our Plan Partner in Stanislaus County to make investments that enhance Medi-Cal Managed Care Plan (MCP) capacity and partnerships to connect members to needed housing services and ultimately reduce and prevent homelessness.

Factors that may arise that may impact Health Net's ability to achieve our goals and HHIP program goals include, but are not limited to, the following:

- The ability of Health Net, local providers, and community partners to quickly build and maintain the operational processes and data connections between MCPs and the homeless system to connect members to needed housing services and, ultimately, permanent housing. This will ultimately determine if MCPs can meet HHIP program measure requirements and thereby draw down HHIP funds to invest in the local communities we serve.
- The time needed to educate providers on HHIP. Throughout the development of the HHIP County Local Homelessness Plan that Health Net submitted to DHCS on June 30, 2022 and this HHIP Investment Plan deliverable, there has been a learning curve for all stakeholders to understand Medi-Cal managed care, the local housing system, and how the two will be connected through CalAIM and HHIP. We expect this collective learning and development to continue throughout the HHIP program period, which may impact the progress of HHIP strategies.
- Staffing capacity and infrastructure of our local level partners. The CoC and community partners have resource constraints that may impact their ability to engage with MCPs on HHIP. Staff turnover, competing priorities, budget limitations or freezes, and other operational changes (i.e., human resources, information technology, legal) that are experienced by our local level partners may impact the MCP's ability to demonstrate the required measure performance necessary within the measurement period to draw down the full HHIP allocation to be able to invest these funds in our local communities.

II. Which aspects of the IP might be affected by those factors:

Health Net is making investments to support our internal data systems and the local HMIS in achieving bi-directional data connectivity; however, the success of these investments may depend on whether both MCP and County staff are able to upgrade both platforms to support HHIP program goals, as well as stand up processes between all entities that ensure data confidentiality and compliance with both Health Insurance Portability and Accountability Act (HIPAA) and Health Information Technology for Economic and Clinical Health Act (HITECH). This may impact all three steps related to the timely transit of information – 1) Securely move the data between entities, 2) validating data quality, and 3) developing the ability to bucket the data within the MCP – and may require the development of new risk mitigation strategies, and corresponding trainings, to ensure that all MCPs, providers, and partners input accurate local housing data and maintain a secure and effective data exchange.

Finally, our ability to ultimately house our members and meet HHIP Priority Area 3 measures through investments in housing capacity and housing placements may be impacted by our ability to make the systemic changes necessary within the HHIP measurement period to unlock current housing units and/or expand housing supply. For example:

- The CoC and community partners have shared concerns about landlord hesitancy to open units to those most vulnerable. Shifting the perceptions that landlords have about the ability of our members experiencing homelessness to maintain stable housing will require significant relationship building and time between community housing providers (i.e., housing navigators), landlords, and the MCPs.
- As noted through the 2022 PIT Count and our ongoing conversations with the CoC, the County is experiencing a shortage in housing supply. There is a risk that newly available units through our HHIP investments may not be given to our members, but rather, to those on the By Name List who are determined to be more vulnerable through the prioritization criteria.
- Finally, new housing units being constructed with HHIP funding may not be open within the measurement period to be able to house our members. Construction delays and ongoing supply chain issues, for example, may impact our ability to demonstrate progress towards the measures tied to housing (Measures 3.5 and 3.6) thereby impacting our ability to draw down 100 percent of the HHIP allocation to be able to invest these funds in the communities we serve.

III. What steps the MCP would take to address these factors and avoid or mitigate impact to the IP.

To address these potential risks, the steps that Health Net will take to avoid and/or mitigate impacts on the Investment Plan include, but are not limited to, the following:

- Establish and maintain ongoing communication channels between our Plan Partner and the CoC to track the status on HHIP investments, identify operational risks, and troubleshoot problems that arise. As part of the County Local Homelessness Plan submitted on June 30, 2022, the MCPs and the CoC agreed to ongoing recurring meetings to discuss and assess HHIP implementation.
- Develop guardrails that promote accountability and minimize fraud, waste, and abuse, including ensuring that the financial agreements between Health Net and entities receiving HHIP disbursements include provisions with specific fund

use cases and clear processes to ensure funds are used properly.

- Related to our internal technology investments, we will be intentional in applying focused resources and working in collaboration with our CoC partners to achieve results in a secure and timely matter. Additionally, Health Net will leverage the expertise of our parent company, Centene Corporation, to launch these capabilities.
- Continue to educate the CoC and community partners about CalAIM, its housing-related service offerings, and associated funding opportunities to support infrastructure development and capacity-building. Our community partners are implementing a variety of local and innovative solutions to tackle the housing crisis and are still learning about CalAIM, Medi-Cal managed care, and the housing-related service offerings. To support CalAIM implementation and ensure non-duplication of funding, we are committed to educating stakeholders about the various funding opportunities offered through CalAIM (i.e., HHIP, CalAIM Incentive Payment Program, Providing Access and Transforming Health (PATH) Capacity and Infrastructure Transition, Expansion and Development (CITED) initiative, etc.)
- Finally, Health Net is committed to assessing the lessons learned from the development and implementation of the Investment Plan and we look forward to sharing these learnings as part of the Submission 1 and Submission 2 deliverables. Through continuous improvement and working closely with the CoC and community partners, we can ensure that investments address the HHIP program goals to build MCP capacity to connect members to services and ultimately reduce and prevent homelessness.

PART III: CoC LETTER OF SUPPORT

Please find attached the Stanislaus Community System of Care's Letter of Support in the Investment Plan Appendix.

PART IV: Attestation

Please find attached Health Net's MCP Attestation in the Investment Plan Appendix.



September 26, 2022


To: California Department of Health Care Services


Re: Housing and Homelessness Incentive Program (HHIP) Investment Plan Letter of Support

The CA-510 Turlock, Modesto/Stanslaus County CoC is supportive of the California Department of Health Care Services (DHCS) Housing and Homeless Incentive Program Investment Plan(s) (IP) being submitted by Health Plan of San Joaquin and HealthNet in Stanislaus County. The CA-510 Turlock/Modesto/Stanslaus County Continuum of Care had the opportunity to engage and collaborate with Health Plan of San Joaquin and HealthNet provide input on the IP, and were able to review the IP prior to the Medi-Cal managed care plan (MCP) submission. The Stanislaus Continuum of Care understands that the IP reflects a non-binding general direction for investments the MCPs are willing to initially make to meet DHCS' HHIP program metrics independent of how the MCPs plan to invest HHIP incentive funds once earned. The Stanislaus Continuum of Care also understands that the MCPs' HHIP investments are contingent on the MCPs meeting HHIP measures over the two-year HHIP program. To this end, the Stanislaus Continuum of Care is committed to collaborating with the MCPs as they engage locally to meet HHIP program metrics.

If you have any questions, please feel free to reach out directly

Thank you,


Jason Conway, Chairperson of the Stanislaus Continuum of Care
jason@mymission.org



**Medi-Cal Managed Care
Housing and Homelessness Incentive Program (HHIP) Investment Plan (IP)
Certification (to be completed by Health Plan CEO/CFO/COO/Authorized Executive)**

Health Plan: Health Net

County: Stanislaus

I certify that, to the best of my knowledge, the IP provides a true representation of the MCP's expected investment plan and strategy for achieving program measures and targets.

As a CEO, CFO, COO, or Executive duly authorized to sign on behalf of the Health Plan listed above, I am authorized or designated to make this Certification, and declare that I understand that the making of false statements or the filing of a false or fraudulent claim is punishable under state and federal law.

By: Martha Santana-Chin
Print name

September 29, 2022
Date


Signature

Medi-Cal President
Title